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December 23, 2014

Margaret Clark, Vice Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
900 South Fremont Avenue
Alhambra, CA 91803-1331

**RE: REQUEST FOR INFORMATION/UPDATE - EFFORTS BY THE INTERAGENCY
WORKING GROUP TO MITIGATE ODORS AT THE SUNSHINE CANYON CITY/COUNTY
LANDFILL**

Dear Ms. Clark,

This letter is in response to your letter dated December 11, 2014, regarding odor abatement efforts by member agencies of the Interagency Task Force on Community Odor Mitigation (Interagency Task Force). As you are aware, the Department of City Planning is a member agency of the Interagency Task Force. In its letter to the Sunshine Canyon Landfill Board of Directors dated June 27, 2013, the Sunshine Canyon Landfill Local Enforcement Agency (SCL-LEA) provided a number of recommendations for odor mitigation that was derived from input from the member agencies of the Interagency Task Force. Those recommended practices are ongoing which include the augmentation of the landfill gas and leachate collection system.

The recommendations were presented to the Technical Advisory Committee (TAC), the Community Advisory Committee (CAC), the Solid Waste Management Committee/Integrated Waste Management Task Force, and the SCL-LEA Board of Directors.

It should be noted that the Department of City Planning is not an air quality enforcement agency, therefore it must defer to those agencies that possess the legal jurisdiction, authority, and expertise in enforcing and recommending methods to mitigate landfill gas and trash odors generated by the landfill. As an example, Notices of Violation (NOVs) are executed by the South Coast Air Quality Management District (SCAQMD) for violations associated with landfill odors. Continuous odor violations in the past have resulted in Abatement Orders issued by the SCAQMD.

Furthermore, as a member of the Technical Advisory Committee (SCL-TAC), (a multi-agency committee established by the City's "[Q]" Conditions, the County's Conditions of Approval, and the Joint Powers Agreement), the Department of City Planning is advised by other agencies as to compliance issues and efforts for odor control.

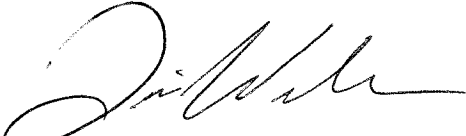
The SCL-TAC also monitors the ongoing operational mitigation program as provided under the Sunshine Canyon Final Environmental Impact Report (FEIR).

Additionally, under Section C of the [Q] Conditions, a Mitigation Monitoring and Reporting Program (MMRP) was incorporated by reference under Condition No. C.1 of the City's "[Q]" Conditions. The MMRP is derived from the certified FEIR. The MMRP identifies public agencies that have jurisdiction regarding the monitoring and enforcement of specific mitigation measures.

As provided on pages 00059 through 00060 of the MMRP (Odor Impacts), the agencies identified as "Monitoring" and "Enforcement" agencies for odor impacts are the SCAQMD and the SCL-LEA. A number of measures for the control of landfill gas and trash odors are identified as Mitigation Measures Numbers 4.2.13, 29 through 35.

Lastly, aside from the odor issues, the Sunshine Canyon Landfill is overall in compliance with the City's "[Q]" Conditions. Air quality monitoring has not shown any evidence of an imminent or substantial risk to health, safety, or welfare of the local community. Therefore, additional efforts by the Department of City Planning is not warranted at this time, as such efforts would only duplicate existing strategies to mitigate odor impacts. The Department of City Planning requests that further communications regarding this matter be addressed to the SCL-TAC.

Sincerely,



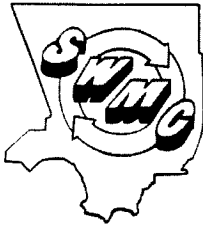
Lisa M. Webber, AICP
Deputy Director of Planning
Co-Chair, SCL-TAC

LW:NH

cc: Honorable Mayor Eric Garcetti
Honorable Councilmember Mitchell Englander, CD 12
Jon Sanabria, Los Angeles County Regional Planning, SCL-TAC Co-Chair
Maria Masis, Los Angeles County Regional Planning
Iris Chi, County Regional Planning
Emiko Thompson, Los Angeles County Department of Public Works
Mohsen Nasemi, South Coast Air Quality Management District

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted.			
c. For unpaved clay roads, mitigation shall include an SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods. Note that this control efficient is less than (i.e., more conservative than) the 95-percent value used at the El Sobrante Landfill (<i>Draft South Coast Air Quality Management District Consultation No. 4, Work in Progress Air Quality Analysis Refinements, El Sobrante Landfill Expansion</i> , TRC Environmental Solutions, Inc., May 2, 1997).	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted.	Project Proponent	Throughout landfill operations.	Monitoring Agency: Project Site Manager and SCAQMD, Enforcement Agency: SCAQMD and
27. Heavy Equipment Operations			
a. Operations shall be restricted to encompass no more than a 10-acre active working face area.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. The disturbed area (subject to the surface erosion) shall be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
28. Site Erosion			
a. To the extent technically feasible, material excavated from one portion of the project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.	Project Proponent	Throughout landfill operations.	Monitoring Agency: CIWMB and City LEA Enforcement Agency: CIWMB and City LEA
c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
d. An SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in place until grasses become established and stabilize on the landfill surface.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD Enforcement Agency: SCAQMD
4.2.13 Odor Impacts			
29. The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs shall be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City LEA Enforcement Agency: SCAQMD and City LEA

Mitigation Measures	Mitigation Compliance Responsibility	Monitoring Phase	Monitoring Agency/Enforcement Agency
30. Operational techniques shall be utilized to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City IEA Enforcement Agency: SCAQMD and City IEA
31. Solid waste shall be compacted within 1 hour of its arrival at the working face.	Project Proponent	Throughout landfill operations.	Monitoring Agency: City IEA Enforcement Agency: City IEA
32. The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD and City IEA Enforcement Agency: SCAQMD and City IEA
33. If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of additional dirt daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City IEA Enforcement Agency: SCAQMD and City IEA
<p>34. To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed landfill project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include:</p> <p>a. <u>Sample Probe Installation:</u> One monitoring probe per 1,000 feet or as identified by South Coast Air Quality Management District (SCAQMD) and/or Local Enforcement Agency (LEA) in the landfill expansion, and one probe per 650 feet or as identified by SCAQMD and/or LEA in the City inactive landfill along the landfill perimeter, or which ever is more restrictive shall be installed to identify potential areas of subsurface landfill gas (LFG) migration. These probes shall be monitored to ensure that quantities of LFG beyond regulatory standards do not vent offsite through subsurface soils.</p> <p>b. <u>Integrated Landfill Surface Sampling:</u> The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm.</p> <p>c. <u>Ambient Air Samples:</u> 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.</p> <p>d. <u>Instantaneous Landfill Surface Monitoring:</u> Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, measured at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.</p> <p>e. <u>Regular Monitoring and Annual Testing:</u> LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.</p>	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City IEA Enforcement Agency: SCAQMD and City IEA
35. Landfill gas flares shall be below the adjacent ridges (unless otherwise required by the South Coast Air Quality District). Flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the City Building and Safety Department. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.	Project Proponent	Throughout landfill operations.	Monitoring Agency: SCAQMD, and City B&S Enforcement Agency: SCAQMD and City B&S



GAIL FARBER, CHAIR
MARGARET CLARK, VICE-CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

December 11, 2014

Mr. Michael J. LoGrande, Director
City of Los Angeles, Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. LoGrande:

**EFFORTS BY INTERAGENCY WORKING GROUP TO MITIGATE ODORS
AT THE SUNSHINE CANYON CITY/COUNTY LANDFILL
REQUEST FOR INFORMATION/UPDATE**

At its October 16, 2014, meeting the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), directed its staff to compile a written report describing measures taken by each member agency of the Sunshine Canyon City/County Landfill Interagency Working Group to mitigate odors at the Sunshine Canyon Landfill during the previous six months. Furthermore, considering that over 1,200 odor complaints had been reported during the first ten months of 2014, the Task Force additionally asked staff to contact the Los Angeles County Department of Regional Planning, and the City of Los Angeles Department of City Planning to gather additional information as to the "land use" agencies' efforts regarding nuisance mitigations pursuant to the County's Conditional Use Permit and the Landfill's City of Los Angeles Zoning Ordinance, as well as the Mitigation Monitoring measures of the Landfill's Environmental Impact Reports.

On November 4, 2014, Ms. Emiko Thompson, as staff to the Task Force, electronically contacted Ms. Ly Lam of your office regarding the Task Force's requested information and update. To date, the Task Force has not yet received any official communication/response from Ms. Lam, nor from your agency. Considering the health and safety of the adjacent communities as well as the close proximity of Van Gogh Elementary School to the Sunshine Canyon Landfill, I am respectfully requesting your response at your earliest but not later than January 8, 2015.

Mr. Michael J. LoGrande
December 11, 2014
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If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,

Margaret Clark

Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor Pro Tem, City of Rosemead

KM:fm

P:\TF\TF\letters\2014\Request2Respond_Nuisance_MitigationSCL(City)

cc: Mayor Eric Garcetti
Councilmember Mitchell Englander, Council District 12
City of Los Angeles, Department of City Planning (Ly Lam)
Each Member/Alternate of the Los Angeles County Integrated Waste Management
Task Force
Each Member of the Facility and Plan Review Subcommittee